



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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July 6, 2021

VIA ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: J-Quan Johnson v. City of New York, et al.
 15 Civ. 6915 (ER) (SN)

Your Honor:

I am one of the attorneys assigned to represent the defendants in this action. Defendants write to respectfully request a brief enlargement of time in which to submit briefing on their post-trial motions, from July 15, 2021, to July 23, 2021. Plaintiff's counsel does not consent to this request.

As the Court is aware, the deadline for this briefing was extended to July 15, 2021, to permit defendants to obtain the transcripts of the trial of this matter. (ECF No. 174). Those transcripts were only received on July 2, 2021, providing limited time to review and prepare briefing. Additionally, the undersigned is, at present, preparing for the trial of another matter scheduled to commence on July 14, 2021, before the Hon. Sidney H. Stein, U.S.D.J., which is expected to last through July 20, 2021.¹ Accordingly, defendants are requesting that the Court grant a brief enlargement of time for defendants to submit their briefing on these motions to July 23, 2021.²

¹ Asencio v. City of New York, et al., 18 Civ. 97 (SHS). Counsel have been advised that this matter is behind one other matter on the trial calendar, but to prepare for it to commence as scheduled.

² Neither of the defendants' other two trial counsel are available to prepare these motions, as one has recently left the Law Department and the other is unavailable this week.

Defendants also write to clarify the Court's Order of June 2, 2021, with regard to defendants' request to stay execution of the judgment entered in this action. (ECF No. 174). Defendants requested a stay of plaintiff's deadline to file any application for costs and fees, and a stay of the execution of judgment in this action, pending the adjudication of defendants' post-trial motions. (ECF No. 172). Plaintiff did not oppose defendants' application (ECF No. 173), which was granted on June 2, 2021. (ECF No. 174). However, the Court's memorandum endorsement referenced only part of the relief sought by defendants—the stay of any fee application. Out of an abundance of caution, and to avoid any later dispute, defendants now write to respectfully request the Court confirm that the request for a stay of execution of the judgment has also been granted.

Defendants thank the Court for its consideration herein.

Respectfully submitted,


/s _____
Hannah V. Faddis
Senior Counsel

CC: **BY ECF**
All Counsel of Record